

FISHER & PHILLIPS LLP
 300 S Fourth Street, Suite 1500
 Las Vegas, Nevada 89101

FISHER & PHILLIPS LLP
 SCOTT M. MAHONEY, ESQ.
 Nevada Bar No. 1099
 300 South Fourth Street
 Suite 1500
 Las Vegas, NV 89101
 Telephone: (702) 252-3131
 Facsimile: (702) 252-7411
 E-Mail Address: smahoney@laborlawyers.com

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSEPH LEWIS,)
) Case No. 2:14-cv-01683-RFB-GWF
Plaintiff,)
) STIPULATION AND ORDER
vs.) ALLOWING CERTAIN
) DEPOSITIONS TO OCCUR
DELTA AIR LINES, INC.) AFTER THE DISCOVERY
) DEADLINE AND EXTENDING
Defendant.) OTHER DEADLINES
) (Second Request)

IT IS HEREBY STIPULATED AND AGREED by and between the parties' counsel of record that one, and possibly two, depositions may occur after the present discovery deadline of October 16, 2015. Specifically, the parties have agreed that because of scheduling conflicts, the deposition of JoAnne Guerrant, who is located in Atlanta, will occur on November 5, 2015. Additionally, Plaintiff wishes to depose Delta's in-house counsel, Kelly Giustina. While Defendant objects to the taking of this deposition, the parties have agreed to defer any deposition and any motion practice associated with the taking of this deposition until after the ruling on the privileged document issues raised in Plaintiff's Motion for an *In Camera* Review of Select Items from Defendant's Privilege Log (docket #41). Following the ruling, Defendant reserves

FISHER & PHILLIPS LLP

300 S Fourth Street, Suite 1500
Las Vegas, Nevada 89101

1 the right to seek a protective order regarding the deposition of Ms. Giustina, but agrees
2 that it will not object to the deposition on the basis that it is occurring after the
3 discovery deadline. This is the second request for any extension of discovery in this
4 case.

5
6 IT IS FURTHER STIPULATED AND AGREED that because the taking or
7 possible taking of the foregoing depositions will not occur until November or thereafter,
8 the dispositive motion deadline will be extended to December 18, 2015 and the deadline
9 for filing a Joint Pretrial Order will be extended to January 18, 2016, or if a dispositive
10 motion is filed, within 30 days after the Court's decision on any dispositive motions.
11 This would be the second extension of these deadlines.

12 This Stipulation and Order has been filed within 21 days of the current
13 discovery deadline because the parties have just been able to finalize their agreements
14 and arrangements regarding these matters and good cause exists for the filing within 21
15 days.
16

STONE & WOODROW, LLP

FISHER & PHILLIPS LLP

17
18
19 /s/ Thatcher A. Stone, Esq.
20 Thatcher A. Stone, Esq.
21 250 West Main Street
22 Suite 201
Charlottesville, VA 22902
Attorney for Plaintiff

/s/ Scott M. Mahoney, Esq.
Scott M. Mahoney, Esq.
300 South Fourth Street
Suite 1500
Las Vegas, NV 89101
Attorneys for Defendant

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: October 9, 2015